

RICHARD W. EPSTEIN (FLA. BAR NO: 229091)

(Pro Hac Vice Admission)

Richard.Epstein@gmlaw.com

REBECCA F. BRATTER (FLA. BAR NO: 0685100)

(Pro Hac Vice Admission)

Rebecca.Bratter@gmlaw.com

MEREDITH H. LEONARD (FLA. BAR NO: 69535)

(Pro Hac Vice Admission)

Meredith.Leonard@gmlaw.com

GREENSPOON MARDER, P.A.

200 E. Broward Blvd., Suite 1500

Ft. Lauderdale, FL 33301

954-491-1120 (phone)

954-343-6958(facsimile)

ROBERT S. BOULTER (SBN 153549)

rsb@boulter-law.com

1101 Fifth Avenue, Suite 310

San Rafael, CA 94901

Tel: (415) 233-7100

Fax: (415)233-7101

Attorneys for Defendants

Global Client Solutions, LLC and

Rocky Mountain Bank and Trust

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

HEATHER NEWTON, individually and
behalf of others similarly situated,

Plaintiff,

v.

AMERICAN DEBT SERVICES, INC., a
California corporation; QUALITY SUPPORT
SERVICES, LLC, a California limited liability
company; GLOBAL CLIENT SOLUTIONS,
LLC; ROCKY MOUNTAIN BANK AND
TRUST; and DOES 1-100,

Defendants.

) Case No: 3:11-cv-03228-EMC

) CLASS ACTION

) **PROPOSED ORDER GRANTING**
) **DEFENDANTS GLOBAL CLIENT**
) **SOLUTIONS, LLC AND ROCKY**
) **MOUNTAIN BANK & TRUST AND**
) **PLAINTIFF HEATHER NEWTON'S**
) **STIPULATED REQUEST FOR**
) **EXTENSION OF TIME FOR**
) **DEFENDANTS TO FILE THEIR**
) **RESPECTIVE REPLY BRIEFS TO THE**
) **PENDING MOTIONS TO DISMISS**
) **AND REVISING BRIEFING**
) **SCHEDULE ON PLAINTIFF'S**
) **FORTHCOMING CLASS**
) **CERTIFICATION MOTION**

THIS CAUSE having come before the Court on Plaintiff Heather Newton ("Plaintiff") and Defendants Rocky Mountain Bank & Trust ("RMBT") and Global Client Solutions, LLC ("Global") (all, "Parties") Stipulated Request for an Order permitting the Defendants a brief extension of time within which to file their respective Reply briefs to the pending Motions to Dismiss and requesting the Court to revise the briefing schedule on Plaintiff's Renewed Motion for Class Certification, it is now thereupon,

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. The Parties' Stipulation is GRANTED.
2. The deadline for RMBT and Global to file and serve their respective Reply briefs in support of their respective Motions to Dismiss is extended up through and including **December 16, 2013**;
3. Plaintiff shall have up through and including **April 10, 2014**, in which to file her motion for class certification;
4. Defendants Global and RMBT shall have up through and including **April 24, 2014**, in which to file their respective responses to Plaintiff's motion for class certification;
5. Plaintiff shall have up to and including **May 1, 2014**, in which to file her reply brief in support of her motion for class certification.
6. The hearing scheduled for March 13, 2014 on Plaintiff's renewed motion for class certification is rescheduled for **May 15, 2013** 2014 at 1:30 p.m.

DONE AND ORDERED in Chambers, at San Francisco, California, on this 9th day of December, 2013.

